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December 11, 2020

Hon. Judge Michael E. Wiles U.S. Bankruptcy Court One Bowling Green New York, New York 10004

Re: Tronox v. Anadarko, Adv. Proc. 09-1198

In re Tronox Incorporated, et al., Chapter 11

Case No. 09-10156-MEW

Motion to Re-Open Adv. Proceeding

Dear Judge Wiles:

We have a motion to re-open the above-referenced adversary proceeding that is returnable on December 15th. The hearing on the motion was adjourned once at the request of the U.S. Attorney's Office. When the hearing was adjourned to December 15th, I informed the parties and the Court that counsel to my client, the N.A.A.C.P., may not be available on that date. I have learned that he is not available and I asked the objecting parties to consent to an adjournment. Ms. DiPierola informed me that January 27, 2021, at 10:00 a.m. was available so long as your Honor agreed to the adjournment. The objecting parties agreed to this adjourned date.

For these reasons, I respectfully request that your Honor grant our request to adjourn the motion to January 27, 2021 at 10:00 a.m.

Thank you for your time and consideration.

Very truly yours,

/s/Norma E. Ortiz

Norma E. Ortiz

cc: Robert Yalen, A.U.S.A Peter Aranoff, A.U.S.A. Matthew C. Ziegler, Esq.